



United States Environmental Protection Agency  
Washington, D.C. 20460

## Water Compliance Inspection Report

### Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 <input type="checkbox"/> N <input type="checkbox"/>	NPDES W A U <input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 6 <input type="checkbox"/> 3 <input type="checkbox"/> 6	yr/mo/day <input type="checkbox"/> 1 <input type="checkbox"/> 5 <input type="checkbox"/> 0 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 5	Inspection Type <input type="checkbox"/> =	Inspector <input type="checkbox"/> R	Fac Type <input type="checkbox"/> 3
Remarks					
21					
Inspection Work Days 67 <input type="checkbox"/> 1 <input type="checkbox"/> 0 <input type="checkbox"/> 69	Facility Self-Monitoring Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 80	

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Anderson Farm Property 3527 Mountain View Road Ferndale, WA 98248	Entry Time/Date 11:40AM 02/25/15	Permit Effective Date N/A
	Exit Time/Date 03:00PM 02/25/15	Permit Expiration Date N/A
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Buzz Katz - Operator (360) 319-2818	Other Facility Data (e.g., SIC NAICS, and other descriptive information) Unpermitted  NAICS 11211 Cattle Ranching and Farming	
Name, Address of Responsible Official/Title/Phone and Fax Number Buzz Katz - Operator 9518 Double Ditch Road Lynden, WA 98264	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Lat: 48.847467 Long: -122.671808	

### Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

### Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
• • • • •	• • • • •
• • • • •	• • • • •
• • • • •	• • • • •
• • • • •	• • • • •

**RECEIVED**  
  
MAR 2 2015  
  
Inspection & Enforcement Management Unit  
(IEMU)

Name(s) and Signature(s) of Inspector(s) Jon Klemesrud	Agency/Office/Phone and Fax Numbers EPA R10/OCE/IEMU (206) 553-5068	Date 02/26/2015
Brian Levo	EPA R10/OCE/IEMU (206) 553-1816	
Jessica Kirkpatrick	WA Dept of Ecology (360) 715-5217	
Signature of Management Q A Reviewer <i>[Signature]</i>	Agency/Office/Phone and Fax Numbers EPA/R10/OCE 3-0955	Date 4/9/15

# INSTRUCTIONS

## Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

## Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

## Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

## Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

***National Pollutant Discharge Elimination System  
(NPDES) Inspection Report***

***Anderson Farm Property  
Ferndale, WA***

***Prepared by:***

***Jon Klemesrud  
Environmental Protection Agency, Region 10  
Office of Compliance and Enforcement  
Inspection and Enforcement Management Unit***

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Buzz Katz, Katherine Mitchell, Chase Carter or from observations made during the inspection.]

## **I. Facility Information**

Facility Name: Anderson Farm Property

Facility Contacts: Buzz Katz – Operator  
Anderson Farm Property - (360) 319-2818

Katherine Mitchell – Environmental Manager  
Alcoa Intalco Works - (360) 961-6720  
4050 Mountain View Road  
Ferndale, WA 98248

Chase Carter – Environmental Water Program Admin  
Alcoa Intalco Works - (360) 384-7259  
4050 Mountain View Road  
Ferndale, WA 98248

NAICS Code: 112111 Cattle Ranching and Farming

Facility Location: Anderson Farm Property  
3527 Mountain View Road  
Ferndale, WA 98248

GPS: N 48.847467 W -122.671808

Mailing Address: Buzz Katz  
9518 Double Ditch Road  
Lynden, WA 98264

NPDES Permit Number: WAU000637

## **II. Inspection Information**

Inspection Date: February 25, 2015

Inspectors: Jon Klemesrud, Inspector  
EPA Region 10, OCE / IEMU  
(206) 553-5068

Brian Levo, Inspector  
EPA Region 10, OCE / IEMU  
(206) 553-1816

Jessica Kirkpatrick  
Washington Department of Ecology  
(360) 715-5217

Arrival Time: 11:40 AM

Departure Time: 03:00 PM

Weather Condition: Cloudy

Receiving water: Jordan Creek

Purpose: The inspection was conducted to document the facility's compliance with the Clean Water Act (CWA).

### **III. Permit Information**

This facility is currently not covered under the Washington Concentrated Animal Feeding Operation (CAFO) National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit.

### **IV. Inspection Chronology**

This was an unannounced CWA inspection. At 11:40AM on Wednesday February 25, 2015 EPA inspector Brian Levo and I arrived at Alcoa Intalco Works in an attempt to identify the operator of the adjacent facility, the Anderson Farm Property. Alcoa Intalco Works is an aluminum smelter facility that owns and leases the adjacent Anderson Farm Property. See Attachment A, Alcoa Intalco Works Land Management Map. We arrived with Washington Department of Ecology representative Jessica Kirkpatrick.

Upon arriving at Alcoa Intalco Works, we met with representatives Katherine Mitchell and Chase Carter. At this time I identified myself as an EPA inspector, presented my credentials and provided each of them with my business card. I informed them that the purpose of this visit was to conduct a routine compliance inspection at the adjacent Anderson Farm Property to determine compliance with the Clean Water Act. Mrs. Mitchell stated that the property is leased to farm operator Buzz Katz. Mrs. Mitchell provided me with Mr. Katz's contact information and informed me that Mr. Katz has no affiliation Alcoa Intalco Works other than the lease agreement.

After contacting Mr. Katz, he gave his consent to the inspection. Mr. Katz and accompanied us throughout the inspection.

The EPA inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection. The inspection included a walk-through of the barn areas and walkways.

We then concluded the inspection with a closing conference where I discussed my inspection observations.

## V. Facility Review

The Anderson Farm Property has been leased to Mr. Katz for about 20 years. According to Mr. Katz his operation is a hobby farm raising beef cattle and is not a licensed business. Mr. Katz stated that he owns about 200 cows which are pastured at the property during summer months, usually from April until October. During the winter months the animals reside in eastern Washington. At the time of the inspection there were approximately 15 cows on the property, mainly bulls that are kept separate from the herd. See Attachment B, Photo #1 - #2.

According to Mr. Katz the animals are never confined. The barn structures at property are used only to gather the heard for loading and transport at the end of the summer. A section of one of the barns is occasionally used for veterinarian visits to assess the herd's health. Mr. Katz stated that a few pastures on the property receive land application of manure periodically. The last application of solid manure occurred the day prior to the inspection by a friend of Mr. Katz. See Attachment B, Photo #3 - #4.

The nearest receiving water is Jordan Creek, a tributary of the Lummi River watershed. Jordan Creek is located downslope from the barn area. It is fenced to eliminate direct access from the herd. See Attachment C, Aerial Map.

## VI. Areas of Concern

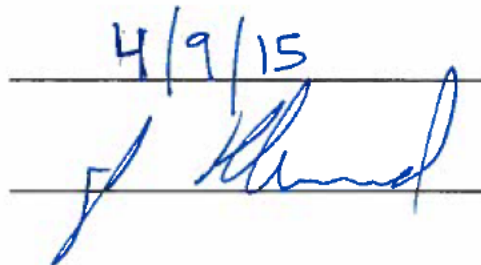
We inspected the facility including barn areas and walkways. No discharge was observed during the inspection however I identified one area of concern:

Slope and Proximity to Jordan Creek: During the inspection I observed several areas where animals naturally congregate near the barn structures that were devoid of vegetation. These areas are positioned with a steep gradient upslope of Jordan Creek. It was apparent that during a rain event, stormwater could channel from the devoid/congregated areas in the direction of Jordan Creek. The concern is that due to the slope and proximity to Jordan Creek, when animals are present, manure/animal waste from the devoid/congregated areas could discharge with stormwater to Jordan Creek. There were no berms in place along Jordan Creek. See Attachment B, Photo #5 - #6.

## VII. Closing Conference

A closing conference was held with Mr. Katz and Mr. Carter to discuss my inspection observations. I then thanked them for their time and cooperation with the inspection.

Report Completion Date:

4/9/15  


Lead Inspector Signature:

# **ATTACHMENT A**

## **Alcoa Intalco Works Land Management Map**

(The Anderson Farm Property leased by Mr. Katz is outlined in Red)

(b)(4) copyright

(b)(4)  
copyright

©2008 Google, Inc. Property, 2008 DigitalGlobe, Map data, 2008

# **ATTACHMENT B**

## **Photo Log**

(All Photographs taken by Brian Levo on February 25, 2015)

Photo #1: Facing west, view of a pasture/field on the property.



Photo #2: Facing north, photo of the few animals pastured at the time of inspection.





Photo #3: Facing south, view of barn area and pasture.



Photo #4: Facing east, view of a pasture/field on the property. According to Mr. Katz, manure solids were applied to the pasture the day prior to the inspection.





**Photo #5:** Facing west, view of a pathway into a pasture/field. Note that there are no berms along the areas crossing the ditch.



**Photo #6:** Facing north, view of a path leading down to the pasture/field. Erosion was observed along this pathway.



# ATTACHMENT C

## Aerial Map

